



New York | Los Angeles | Miami

7 Times Square, New York, NY 10036-6569 Tel: 212-421-4100 Fax: 212-326-0806

www.pryorcashman.com

**Jeffrey Alberts**  
Partner

Direct Tel: 212-326-0800  
Main Fax: 212-326-0806  
jalberts@pryorcashman.com

August 14, 2024

**VIA ECF**

The Honorable Magistrate Judge James R. Cho  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *In re Forfeiture Order of Tim Leissner*, 23-mc-1505 (MKB)(JRC)

Dear Magistrate Judge Cho,

Pursuant to Rule F(4) of this Court's Individual Practices, Petitioner Russell Simmons requests leave to file a motion to compel regarding (i) certain documents that Mr. Simmons has requested from Petitioner Kimora Lee Simmons-Leissner and the government and (ii) the location of Ms. Lee's deposition. Mr. Simmons has discussed these issues with the government and counsel for Ms. Lee via numerous letters and emails over the course of the summer, and the parties have reached an impasse. In light of the need to promptly resolve these issues before the September 17, 2024 close of fact discovery, the parties agree that the most efficient path forward is for Mr. Simmons to file his motion by August 16, 2024 and for the government and Ms. Lee to oppose that motion.

Ms. Lee and the government request two weeks to respond to any motion filed by Mr. Simmons (*i.e.*, by August 30, 2024). Mr. Simmons requests that the response be filed in one week (*i.e.*, by August 23, 2024).

Sincerely,

/s/ Jeffrey Alberts

Jeffrey Alberts

cc: Counsel of record